

Commonwealth of Kentucky
Division for Air Quality

RESPONSE TO COMMENTS

ON THE TITLE V Title V/Synthetic Minor DRAFT PERMIT V-03-032
BUFFALO TRACE DISTILLERY, INCORPORATED
1001 Wilkinson Boulevard, Frankfort, Kentucky 40601
January 12, 2004
Monika Kannadaguli, Reviewer
Plant I.D. # 21-073-00009
Application Log # 55698

SOURCE DESCRIPTION AND COMMENTS:

Buffalo Trace Distillery, Inc. is proposing renewal of their operating Title V/Synthetic Minor permit that will expire on January 21, 2004 with following modifications:

1 Emissions Unit 03 (02-001 and 02-005) Fermentation Process

The current operating permit requires Buffalo Trace to monitor and record gallons of proof gallons produced. However, the Emissions Inventory System (EIS), requires tons of grains produced. According to section 9.12.3, Distilled spirits, of AP-42, the units used to estimate emissions is 1000 bushels of grain input. The permit has been amended to reflect the recordkeeping conditions on this unit.

2 Emissions Unit 08 (09-001) Indirect Heat Exchanger

Emissions Unit 10 (09-003) Indirect Heat Exchanger

Emissions Unit 14 & 15 (14-001 and 14-002) Two Indirect Heat Exchangers

- a. The primary, secondary and tertiary fuels for Emission Units 08, 10, 14 & 15 as listed in operating permit are:

Table 1

| Emissions Unit | Primary Fuel | Secondary Fuel | Tertiary Fuel |
|--|--------------|--------------------------------------|---------------|
| Emissions Unit 08 (09-001) Indirect Heat Exchanger | Waste-oil | Distillate-oil (#2 & #4 fuel oil) | Natural gas |
| Emissions Unit 10 (09-003) Indirect Heat Exchanger | Waste-oil | Distillate-oil (#2 & #4 fuel oil) | Natural gas |
| Emissions Unit 14 & 15 (14-001 and 14-002) Two Indirect Heat Exchangers | Natural gas | Distillate-oil | ----- |

The source requests the following change in the fuel type:

Table 2

| Emissions Unit | Primary Fuel | Secondary Fuel | Tertiary Fuel |
|--|--------------|--------------------------------------|---------------|
| Emissions Unit 08 (09-001) Indirect Heat Exchanger | Natural gas | Distillate-oil (#2 & #4 fuel oil) | Waste-oil |
| Emissions Unit 10 (09-003) Indirect Heat Exchanger | Natural gas | Distillate-oil (#2 & #4 fuel oil) | Waste-oil |
| Emissions Unit 14 & 15 (14-001 and 14-002) Two Indirect Heat Exchangers | Natural gas | Distillate-oil (#2 & #4 fuel oil) | Waste-oil |

The permit has been amended to reflect the change in fuel usage for emission units 08, 10, 14 & 15.

- b. 401 KAR 59:015 applies to emission units 08, 10, 14 & 15, and 401 KAR 60:005 incorporating by reference 40 CFR 60, Subpart Dc, also applies to emission units 14 & 15.
- c. The source has proposed the use of natural gas as a primary fuel for Emission Units 08, 10, 14 & 15. However, the source shall conduct a performance test for particulate emissions when combusting fuel oil or waste oil if such usage exceeds 60 days within any consecutive 12 months period.

3 Emissions Unit 09 (09-002) Indirect Heat Exchanger (coal fired)

- a. Performance testing requirement for this emissions unit has been changed from "within one year from the issuance of this permit" to "within the term of this permit".
- b. The frequency of method 9 opacity test has been changed from "once during each daylight shift, weather permitting" to "once per month during the daylight shift".

4 Unused coal –fired boiler

An unused coal-fired boiler is located in the same building as the permitted coal-fired boiler [Emissions Unit 09 (09-002)]. As per the information provided by the source, the boiler has been taken out of service since 1975. The induction fan has been disconnected, the header has been blinded and the blow-downs disconnected. It would take a significant amount of time and expense to renovate the boiler. Buffalo Trace does not currently intend to place the boiler back in service. Should these intentions change the source is required to submit an application to the Division of Air Quality.

This source is also imposing a voluntary source-wide requirement to ensure the non-applicability of Regulation 401 KAR 51:017 (PSD). For this the total particulate, total sulfur dioxide, and total nitrogen oxide emissions from the site shall not exceed 245 tons in any consecutive 12-month period.

PUBLIC AND U.S. EPA REVIEW:

On November 05, 2003, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The State Journal* in Frankfort, Kentucky. The public comment period expired 30 days from the date of publication.

No comments were received during this period. The permit is now being issued as a proposed permit. U.S. EPA has 45 days from the date of the issuance to submit comments. If no comments are received during this period, the Division consider the permit final as conditioned.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.